

THE CITY OF NEW YORK

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November 30, 2020

VIA ECF

JAMES E. JOHNSON

Corporation Counsel

The Honorable Denise L. Cote United States District Judge Southern District of New York 500 Pearl Street New York, N.Y. 10007



Re: <u>Kathy Camacho, et. al. v. City of New York, et. al.</u>, 19 CV 11096 (DLC); Arisbel Gusman v. City of New York, et. al., 19 CV 11691 (DLC)

Your Honor:

I am a Senior Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, representing defendants in the above-referenced matter. I write jointly with plaintiffs' counsel in both <u>Camacho</u> and <u>Gusman</u> to respectfully request that the discovery conference scheduled for Wednesday, December 2, 2020 at 2:00 p.m. be adjourned because video depositions of two of the Camacho plaintiffs are already scheduled for December 2, 2020, including the plaintiff Justine Rodriguez, at 2:00 p.m. that day. The parties have conferred and are available December 7, 2020 at 2:00 or later, or December 8 or 9 in the afternoons of those days, for the conference, should those dates and times be convenient for Your Honor.

This is the first request for an adjournment of the discovery conference.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Mark D. Zuckerman

Mark D. Zuckerman Senior Counsel

Granted. The conference will take place on December 7, 2020 at 3:00pm.

12.1.2020

United States District Judge

cc: All Counsel (via ECF)